

Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Attn: Blane A. Workie, Assistant General Counsel for Aviation Enforcement Proceedings

**Ref: MCH.KR/ 67.669**

**Brussels, 25 September 2018**

Re: Submission in *NABR v. United Airlines et al.* Docket No. DOT-OST-2018-0124

Dear Madam Secretary,

We are submitting this letter to provide the Department of Transportation (DOT) with information that may be relevant to its evaluation of the above referenced complaint, which alleges that various airlines refuse to carry animals for critical biomedical research, but carry animals for other purposes.

The European Federation of Pharmaceutical Industries and Associations (EFPIA) represents the pharmaceutical industry operating in Europe. Through its direct membership of 36 national associations and 40 leading pharmaceutical companies, EFPIA is the voice on the EU scene of 1,900 companies committed to researching, developing and bringing to patients new medicines that will improve health and the quality of life around the world.

In the pharmaceutical industry, only when it is necessary and unavoidable, animals are used for research to help scientists bridge the gap between the theories developed and the reality of introducing a new treatment to the patient. It is legally required that new medicines ensure maximum safety to humans, making the use of animals an essential step in the medical development process. So, in short, without animal testing, there would be no new medicines.

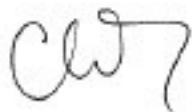
European legislation and good research practice require animals used in research to be purpose bred, however those animals cannot always be bred in or close to research sites, and therefore transportation in good conditions greatly contributes to the overall welfare of laboratory animals. The primary objective while ensuring that legislative requirements are met, should be that animals are transported in a manner that does not jeopardise their well-being and ensures their safe arrival at their destination in good health, with minimal distress or fear which is important to ensure good animal welfare and the validity of scientific procedures.

According to the complaint, many airlines refuse to transport animals for these vital scientific discoveries, although the airlines will transport the same animal for non-research purposes, such as for zoos or as pets. We believe that as long as the government requires this research, it should enforce its laws in a way that does not undermine these essential research requirements. This arbitrary delineation by the airlines - which we understand has no transportation related purpose - threatens the progress of key research.



We urge the DOT to investigate the complaint filed by NABR and to require all airlines to eliminate policies which discriminate against animal carriage and instead base carriage solely on the fact that the purpose of the transportation of animals is for legal, legitimate, necessary and essential life-saving biomedical research. We respectfully request that DOT take these actions to ensure the continued progress of essential medical research.

With kind regards,



Magda Chlebus  
Executive Director Science Policy & Regulatory Affairs



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